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20 UNITED STATES DISTRICT COURT

21 FOR THE NORTHERN DISTRICT OF CALIFORNIA

22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF  
24 GOVERNMENT EMPLOYEES, AFL-CIO;  
25 AMERICAN FEDERATION OF STATE  
26 COUNTY AND MUNICIPAL EMPLOYEES,  
27 AFL-CIO, et al.,

Plaintiffs,

v.  
28 UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF DANIELLE  
LEONARD IN SUPPORT OF  
PLAINTIFFS' MOTION TO SHORTEN  
TIME TO HEAR PLAINTIFFS' MOTION  
FOR LEAVE TO AMEND COMPLAINT;  
LEAVE TO JOIN NEW PLAINTIFFS TO  
PRELIMINARY INJUNCTION MOTION;  
AND LEAVE TO FILE ADDITIONAL  
DECLARATION EVIDENCE**

## **DECLARATION OF DANIELLE LEONARD**

I, Danielle Leonard, declare as follows:

1. I am a member in good standing of the State Bar of California and the bar of this Court. I represent the Plaintiff organizations in this action. I make this declaration pursuant to Local Rule 6-3, in support of Plaintiffs' Motion to Shorten Time to Hear Plaintiffs' Motion for Leave to Amend Complaint, to Join New Plaintiffs to Preliminary Injunction Motion, and to File Additional Declaration Evidence (hereinafter "Motion for Leave").

2. Plaintiffs seek shortened time on the Motion for Leave in light of the preliminary injunction hearing set for March 13, 2025. As the amended complaint Plaintiffs propose to file sets forth in detail, Plaintiffs' amended complaint, which is being filed less than three weeks from the outset of this case, seeks to add new plaintiffs who join the existing claims, new defendants in the same types of claims and to effectuate the existing requests for relief, and new facts that have transpired or come to Plaintiffs' attention subsequent to the last complaint. First, several potential additional Plaintiffs that have been injured by the OPM mass termination actions challenged would like to join this lawsuit. Plaintiffs have also identified as potential additional defendants all federal agencies that received Defendants' February 14 email directive, which—as Plaintiffs will prove at the March 13, 2025 hearing—are implementing the unlawful policy challenged in this lawsuit. The addition of these parties does not broaden the claims or the scope of relief, which is, as it has been from the outset, a request to facially invalidate the OPM orders, halt all further terminations, and reinstate the employees previously fired. Plaintiffs respectfully request that this motion to shorten time be granted so that the parties can have sufficient time to prepare for the March 13, 2025 hearing.

3. At the hearing on Plaintiffs' TRO Motion on February 27, 2025, I raised the issue of leave to amend the complaint to file a second amended complaint. The Court granted leave to file the

1 motion for leave, along with setting a hearing on Plaintiffs' preliminary injunction for March 13,  
2 2025.

3       4. First thing on the morning of Monday, March 3, 2025, I e-mailed counsel for  
4 Defendants to request a meet and confer conference with respect to Plaintiffs' motion for leave to file  
5 an amended complaint, on shortened time, among other issues. I informed Defendants that Plaintiffs  
6 intended to add new Plaintiffs and Defendants.  
7

8       5. On March 3, 2025, Plaintiffs met and conferred with Defendants about a variety of  
9 issues. Plaintiffs asked Defendants to consent to leave to file an amended complaint naming  
10 additional federal agencies as defendants and adding new plaintiffs, and to shorten time to allow  
11 resolution of the motion for leave by the end of this week. Defendants did not agree.  
12

13       6. On March 4, 2025, at 5:00 PM PT, I again emailed seeking Defendants' consent to  
14 leave to amend and shortened time for the Court to consider the motion. I explained again Plaintiffs'  
15 proposed amendments, as well as Plaintiffs' request to join those new plaintiffs to the preliminary  
16 injunction motion and to file additional declaration evidence, and of Plaintiffs' forthcoming request  
17 that the Court rule on Plaintiffs' motion for leave by this Friday, March 7th, proposing that  
18 Defendants file any opposition to Plaintiffs' motion for leave by Thursday, March 5th. I asked  
19 Defendants to inform us if they had changed their position and would consent. Plaintiffs have not  
20 received a response by the time of this filing.  
21

22       7. Plaintiffs will be substantially prejudiced if Plaintiffs' Motion to shorten time is not  
23 granted. If briefing proceeds on the ordinary schedule, it will not be resolved before the March 13,  
24 2025 hearing and the parties will be unable to adequately prepare for that hearing.  
25

26       8. No previous modifications of briefing schedules have been ordered or stipulated in  
27 this case.  
28

Declaration of Danielle Leonard ISO Motion to Shorten Time, No. 3:25-cv-01780-WHA

9. The time modification sought by this motion would not affect any other deadlines in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 4, 2025, in San Francisco, California.

Danville, Va.

Danielle Leonard